

**BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554**

In the Matter of)	
)	
Wireless E911 Location Accuracy Requirements)	PS Docket No. 07-114
)	
Revision of the Commission's Rules to Ensure)	CC Docket No. 94-102
Compatibility with Enhanced 911 Emergency)	
Calling Systems)	
)	
Association of Public-Safety Communications)	
Officials-International, Inc. Request for)	
Declaratory Ruling)	
)	
911 Requirements for IP-Enabled Service Providers)	WC Docket NO. 05-196

**COMMENTS OF THE WAUKESHA COUNTY, WISCONSIN DEPARTMENT
OF EMERGENCY PREPAREDNESS**

I. INTRODUCTION:

The Department of Emergency Preparedness of Waukesha County, Wisconsin, respectively provides these comments regarding the above captioned matters addressed in the Notice of Proposed Rulemaking, FCC 07-108, adopted by the Commission on May 31, 2007.

II. DISCUSSION:

Waukesha County Communications, a division of the Department of Preparedness, was the first Public Safety Answering Point (PSAP) in the State of Wisconsin to implement wireless 9-1-1 Phases I & II. Even before the State of Wisconsin had wireless legislation, the county started the process with the seven cellular providers offering service in the area. This initiative enabled the county to start with the process of working with the providers so that the first wireless 9-1-1 call was answered by Waukesha County Communications (WCC) in less than 10-months after the legislation was signed by the governor.

Waukesha County Communications is one of eight PSAPs in the county, and per state legislation, is the primary answering point for wireless 9-1-1 calls for the county. This year the percentage of wireless 9-1-1 calls received is 80% of the total 9-1-1 activity. WCC also transfers 34% of their 9-1-1 calls to other PSAP in the county and to surrounding counties.

In a recent study conducted by the center, forty percent of the "abandoned" calls, come from wireless devices. The center dispatches first responders to all abandoned calls, even after contact is made, to

ensure the caller is safe and not in any danger. Therefore, we rely heavily on the accuracy of the X/Y coordinates in the dispatching function. Weekly, we have situations that demonstrate to us that the location data provided by Phase II technology is instrumental in finding that caller in a timely manner. Without accurate data, the first responder's ability to respond quickly to these emergencies could be severely hampered.

As the primary PSAP for wireless 9-1-1 in the county, we have been asked on a number of occasions to explain to our thirty-seven municipalities, the other PSAPs, and our county board as to the accuracy of the location data supplied with these calls. While we can point to accuracy for a specific call, we have no data available to us other than the word of the cellular providers that they are meeting the 50-meter accuracy for 67% of the calls received for handset-based technologies and the 100-meter accuracy for 67% of the calls received from network-based technologies. This current method of evaluating the accuracy of the data is after the fact and is very limited in scope. To date, we have no credible data to refer to or offer to our first responders and our residents.

While I "feel" the accuracy of our location data for wireless 9-1-1 is good, and I am at a loss to validate that opinion with data from the cellular providers for calls made within the boundaries of our system. If we had meaningful accuracy data by provider, we would be in a much better position to provide the first responders with better parameters for calls for service received by cellular devices. Without this, we have been forced to make assumptions and cannot rely on the accuracy of the location in the dispatch function.

APCO, through its petition is asking the FCC to declare the "PSAP Service Area" as the most appropriate test area for wireless accuracy and I support that position.

III. CONCLUSION:

As our citizens become more reliant on wireless devices it is public safety's role to ensure those that call 9-1-1 for assistance that the first responders will be able to respond quickly and to the correct location in their time of need. We have spent many years promoting wireline 9-1-1 as the number to call for help. Even if you cannot talk, or speak a different language, we will find you because the 9-1-1 data includes your location. Our citizens have been educated to use 9-1-1 and expect the same level of service even though they are using a different technology. A technology, by the way, that the cellular providers have advertised as the tool to use if you need help and you do not know where you are!

As the number of cellular devices in use increase, we need to be able to meet callers' expectations and be able to locate them accurately and in a timely manner, and to be able to qualify that accuracy within "our" system. We ask you to support the APCO Petition for Declaratory Ruling PS Docket No. 07-114, on the use of the PSAP Service Area for accuracy standards.

Respectfully Submitted,

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